

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)
) CASE NO. 18-68840-jrs
Scottie Lamar Cousins,)
) CHAPTER 13
Debtor.)

NOTICE OF HEARING

PLEASE TAKE NOTICE that Scottie Lamar Cousins has filed a Motion to Incur Debt (Doc. seeking an Order to Approve the Motion.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion in **Courtroom 1404**, U.S. Courthouse, 75 Ted Turner Drive SW, Atlanta, Georgia 30303 at **9:40 a.m.** on **April 13, 2021**.

Your rights may be affected by the court's ruling on these pleading. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how, and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is The address of the Clerk's Office is Clerk, Room 1340, 75 Ted Turner Drive, S. W., Atlanta, Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: March 30, 2021

/s/ _____
Dan Saeger, Attorney for Debtor
Georgia Bar No. 680628
SAEGER & ASSOCIATES, LLC
706 S. Thornton Ave. Ste. D
Dalton, GA 30720
(P) 706-529-5566
(F) 706-529-3775
dan@whitfieldcountylaw.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	
)	CASE NO. 18-68840-jrs
Scottie Lamar Cousins,)	
)	CHAPTER 13
Debtor.)	

MOTION TO INCUR NEW DEBT BY PURCHASING A HOUSE

COMES NOW Scottie Lamar Cousins, Debtor in the above-styled Chapter 13 case, by and through counsel, and files this "Motion to Incur Debt", and shows this honorable court the following:

1.

This Court has jurisdiction in this matter pursuant to 28 U.S.C. Sections 1334, 151 and 157.

2.

This Court is the proper venue for this matter pursuant to 28 U.S.C. Section 1409.

3.

This matter is a core proceeding as defined in 28 U.S.C. Section 157(b)(2)(N).

4.

Debtor filed the petition for relief in the above-styled Chapter 13 case on November 6, 2018. The Chapter 13 plan was confirmed on July 16, 2019.

5.

The anticipated purchase price of the home is \$299,000 with a monthly payment of \$2200 and a term of 360 months and an interest rate of approximately 4.75%.

6.

The exact location of the property is unknown but is anticipated to be in the Northern Suburbs of Atlanta.

WHEREFORE, Debtor prays:

- (a) that this Motion be filed, read and considered;
- (b) that this Motion be granted; and,
- (c) that this Honorable Court grant such other and further relief as it deems just and proper.

This the 30th day of March, 2021.

Respectfully submitted,
_/_s/_____

Dan Saeger
Attorney for Debtor
Georgia Bar No. 680628

SAEGER & ASSOCIATES, LLC
706 S. Thornton Ave. Ste. D
Dalton, GA 30720
(P) 706-529-5566
(F) 706-529-3775
dan@whitfieldcountylaw.com

CERTIFICATE OF SERVICE

I certify that true and correct copies of the Debtors' Amended Motion to Incur Debt have been served upon the following by placing same in an envelope with adequate First Class postage affixed and depositing the same in the United States Mail addressed for delivery to:

Nancy J. Whaley
Chapter 13 Trustee
303 Peachtree Center Avenue
Suite 120, Suntrust Garden Plaza
Atlanta, GA 30303

Scottie Lamar Cousins
PO Box 2236
Jonesboro, GA 30237

And all creditors listed in the matrix below

This the 30th day of March, 2021.

_____/s/_____

Dan Saeger
Attorney for Debtor
Georgia Bar No. 680628

SAEGER & ASSOCIATES, LLC
706 S. Thornton Ave. Ste. D
Dalton, GA 30720
(P) 706-529-5566
(F) 706-529-3775
dan@whitfieldcountylaw.com

Label Matrix for local noticing
113E-1
Case 18-68840-jrs
Northern District of Georgia
Atlanta
Tue Feb 18 20:33:40 EST 2020

ADT
1 Town Center Rd
Boca Raton, FL 33486-1039

AFB T A Division of Synovus
150 W Hancock Ave
Athens, GA 30601-2726

ASHER Collection Svcs.
4524 Southlake Pkwy # 15
Hoover, AL 35244-3271

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

Atlas Acquisitions, LLC
Attn: Avi Schild
294 Union Street
Hackensack, NJ 07601-4303

CASH EXPRESS LLC
Mayfield & Lester, Attys
PO Box 789
Chattanooga, TN 37401-0789

CASH EXPRESS LLC
c/o Mayfield & Lester, Attys
PO Box 789
Chattanooga, TN 37401-0789

Capital Asset Recovery, LLC
PO Box 192585
Dallas, TX 75219-8523

Capital One Auto Finance
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Capital One Auto Finance, a division of Capi
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Capital One Bank
PO Box 30281
Salt Lake City, UT 84130-0281

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

(p)CASH EXPRESS LLC
345 SOUTH JEFFERSON AVENUE SUITE 300
COOKEVILLE TN 38501-3456

Check into Cash
1133 N Glenwood Ave
Dalton, GA 30721-2623

Cintas
505 Airport Rd
Chattanooga, TN 37421-3514

Cisco
2225 Riverdale Rd
College Park, GA 30337-5111

Coca Cola
2111 W Shepherd Rd
Chattanooga, TN 37421-2315

Scottie Lamar Cousins
PO Box 2236
Jonesboro, GA 30237-2236

Credit One Bank
PO Box 98872
Las Vegas, NV 89193-8872

DSRM National Bank
PO Box 631
Amarillo, TX 79105-0631

Dalton Food and Tobacco
601 N Glenwood Ave
Dalton, GA 30721-2816

Division of Child Support Services
2910 Miller Road
Suite 100
Decatur, GA 30035-4264

Division of Child Support Services
Attn: Bankruptcy Dept.
102 College St
Carrollton, GA 30117-3137

Employee Solutions
1011 Abutment Rd
Dalton, GA 30721-4680

Family Check Cashing
1317 Decatur Pike
Athens, TN 37303-2417

Joseph P Farrell
O'Kelley & Sorohan, Attorneys at Law LLC
Suite 375
2170 Satellite Blvd.
Duluth, GA 30097-4983

Fedloan Servicing
PO Box 60610
Harrisburg, PA 17106-0610

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107-0145

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

Georgia Power
96 Annex
Atlanta, GA 30396-0001

Georgia Power Company
2500 Patrick Henry Pkwy
BIN 80003
McDonough, GA 30253-4298

Ginnys
PO Box 2825
Monroe, WI 53566-8025

Gordon Food Service
1500 N River Rd
Lithia Springs, GA 30122-3896

Harbor Touch
2202 N Irvine St.
Allentown, PA 18109-9554

IH6 Property Georgia , LP
2170 Satellite Blvd., Ste 375
Duluth, GA 30097-4983

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Invitation Homes
1717 Main St Ste 2000
Dallas, TX 75201-4657

Maria C. Joyner
Nancy J. Whaley,
Standing Chapter 13 Trustee
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303-1286

Kohl's Dept Store
PO Box 3115
Milwaukee, WI 53201-3115

LVNV Funding, LLC its successors and assigns
assignee of FNEM, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Ladonya M. Horton
2910 Miller Road
Suite 100
Decatur, GA 30035-4264

Gary E. Lester
Mayfield & Lester
P. O. Box 789
Chattanooga, TN 37401-0789

MERRICK BANK
Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Macys DSNB
PO Box 8218
Mason, OH 45040-8218

Market Grocery
PO Box 397
Forest Park, GA 30298-0397

Merrick Bank
PO Box 9201
Old Bethpage, NY 11804-9001

Mid America Bank & Trust
5109 S Broadband Ln
Sioux Falls, SD 57108-2208

NAVIENT
C/O Navient Solutions, LLC.
PO BOX 9640
Wilkes-Barre, PA 18773-9640

NAVIENT CFC
C/O Navient Solutions, LLC.
PO BOX 9640
Wilkes-Barre, PA 18773-9640

NAVIENT PC TRUST
C/O Navient Solutions, LLC.
PO BOX 9640
Wilkes-Barre, PA 18773-9640

NPRTG Georgia, LLC
256 West Data Drive
Draper, UT 84020-2315

Navient
PO Box 9655
Wilkes Barre, PA 18773-9655

Payline
225 W Wacker Dr
Chicago, IL 60606-1260

Performance Food Group
Simpson, Uchitel & Wilson, LLP
PO Box 550105
Atlanta, GA 30355-2605

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, Llc
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

Progressive Leasing
256 W Data Dr
Draper, UT 84020-2315

Royal Wholesale Foods
4450 Business Park Ct SW
Lilburn, GA 30047-2974

Dan Saeger
Saeger & Associates, LLC
Suite D
706 S Thornton Ave
Dalton, GA 30720-8212

Daniel R. Saeger
Rickman & Associates, P.C.
706 S Thornton Ave. Ste. D
Dalton, GA 30720-8212

Scottie Lamar Cousins
801 East 12th Street
Chattanooga, TN 37403-3208

Shandra North
634 N Aycock St
Carrollton, GA 30117-2930

Southerland's Food Service
PO Box 786
Forest Park, GA 30298-0786

State Court of DeKalb County
556 N McDonough St
Decatur, GA 30030-3355

Sysco Atlanta, LLC
2225 Riverdale Rd.
College Park, GA 30337-5121

THS Food Service
801 E 12th St
Chattanooga, TN 37403-3208

THS Food Service Distributor
801 E. 12th Street
Chattanooga, TN 37403-3208

THS Foodservice
801 East 12th Street
Chattanooga, TN 37403-3208

U.S. Department of Education
C/O FedLoan Servicing
P.O. Box 69184
Harrisburg PA 17106-9184

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW, Suite 600
Atlanta GA 30303-3309

University of West Georgia
1601 Maple St
Carrollton, GA 30118-0001

Vader Servicing
5 W 37th St Fl 2
New York, NY 10018-5385

Vader Servicing, LLC
Everest Business Funding
8200 N.W. 52nd Terrace, Suite 200
Doral, FL 33166-7852

Varius Holdings, LLC
PO BOX 1931
Burlingame, CA 94011-1931

Brandi Nicole Wade
O'Kelley & Sorohan Attorneys at Law LLC
Suite 375
2170 Satellite Blvd,
Duluth, GA 30097-4983

Nancy J. Whaley
Nancy J. Whaley, Standing Ch. 13 Trustee
303 Peachtree Center Avenue
Suite 120, Suntrust Garden Plaza
Atlanta, GA 30303-1216

Whitfield County Magistrate Court
Attention: Civil Clerk
PO Box 368
Dalton, GA 30722-0368

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Cash Express, LLC
345 South Jefferson Avenue, Suite 300
Cookeville, TN 38501

Georgia Department of Revenue
1800 Century Blvd NE
Atlanta, GA 30345-3202

Internal Revenue Service
Attn: Centralized Insolvency Operation
PO Box 21126
Philadelphia, PA 19114-0326

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Harbor Touch2202 N Irvine St.Allentown, PA

(u)IH6 Property Georgia, LP

(u)Scottie Cousins 18-68840

(d)Nancy J. Whaley	End of Label Matrix	
Nancy J. Whaley, Standing Ch. 13 Trustee	Mailable recipients	77
303 Peachtree Center Avenue	Bypassed recipients	4
Suite 120, Suntrust Garden Plaza	Total	81
Atlanta, GA 30303-1216		